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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

**File: 2AM-MRY1325  
Modification No. 11**

April 3, 2019

Christopher Murray  
Environmental & Regulatory Compliance Manager  
Baffinland Iron Mines Corporation  
Suite 300 – 2275 Upper Middle Road East  
Oakville, Ontario, Canada L6H 0C3

Email: [christopher.murray@baffinland.com](mailto:christopher.murray@baffinland.com)

**RE: Licence No. 2AM-MRY1325 Type “A”; Mary River Project, Baffinland Iron Mines Corporation; Modification No. 11 - Installation of an Incineration Unit at Milne Port’s 380-Person Camp**

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Dear Mr. Murray:

On February 28, 2019, the Nunavut Water Board (NWB or the Board) received a request by Baffinland Iron Mines Corporation (BIMC or the Licensee) for a modification (the Request) to the amended Licence No. 2AM-MRY1325 (the Licence) issued to BIMC for the Mary River Project (the Project). The scope of work is to install and operate an incinerator at the 380-person camp located at Milne Port.

Copies of all documents received in support of the Request can be accessed through the NWB’s Public Registry and FTP site using the following link:

[ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/6%20MODIFICATIONS%20\(G\)/Modification%20No.%2011%20380%20Person%20Camp%20Incinerator/](ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/6%20MODIFICATIONS%20(G)/Modification%20No.%2011%20380%20Person%20Camp%20Incinerator/)

The Licensee received the Board’s approval for modification 3b that entailed the construction of a 380-person camp and supporting infrastructure in January 2019. The installation of an incinerator wasn’t included into the original request for a modification 3b, as it deemed that it required more information on the camp’s capacity for waste management. As BIMC concluded that incineration of waste is required for the camp, it subsequently requested the Board’s approval for the activity.

The Licensee states that the emissions from the incinerator will satisfy the Government of Nunavut’s *Environmental Guideline for the Burning and Incineration of Solid Waste*. The incinerator ash will be tested and, provided its quality is in line with the Government of Nunavut’s *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste*

*and Sewage Treatment Facilities*, disposed of at a landfill. If ash is classified as a hazardous waste, it will be directed to an authorized facility for disposal.

The Request was distributed for review by intervenors on March 4, 2019. Only Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) followed up with an information request<sup>1</sup>. The intervener recommended the Licensee to submit a drawing detailing how the incinerator will be foundationally supported and fastened. The Licensee responded that the incinerator is a skid-mounted unit.

#### NWB's Review and Decision

The NWB, having fully reviewed the Licensee's request in the context of intervenors' comments and recommendations, potential impact of the proposed activities on the freshwater environment, and consistency of the proposed activity in relation to the scope of the Licence, determined that the upgrades proposed are consistent with the scope of activities and with requirements of Part G, Item 1 of the Licence. Therefore, by way of this correspondence, the Board authorizes BIMC to undertake the activities proposed.

The Board reminds the Licensee to fully adhere to the following:

- Part F, Item 7 of the Licence, requiring testing of *bottom ash generated by all Incinerator Systems, by using the acceptable test procedures for analyzing residuals, prior to being disposed of at any Landfill...*;
- ECCC's *Technical Document for Batch Waste Incineration* (January 2010); and
- Government of Nunavut's *Guideline for Burning and Incineration of Solid Waste*.

The Licensee is also required to update its Waste Management Plan for Board review within thirty (30) days of the installation and pre-operational testing of the incinerator.

In addition, the Board advises the Licensee that in accordance with Part G, Item 2 of the Licence, changes in excess of those authorized under this modification, may constitute a separate potential modification or amendment to the Licence, which may require respective determination(s) from the Nunavut Planning Commission (NPC) and/or the NIRB prior to receiving any consideration(s) and/or determination(s) from the NWB. Further, in keeping with Part G, Item 4 of the Licence's terms and conditions, the submission of post-construction information, including as-built plans and drawings, shall remain applicable to this authorization.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca) or by phone at (867) 360-6338.

Sincerely,

Assol Kubeisinova  
Nunavut Water Board  
Technical Advisor

Enclosure: Comments – CIRNAC  
Cc: Distribution List – Mary River

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<sup>1</sup> CIRNAC submission dated March 18, 2019.